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VIA ECF

Hon. Lorna G. Schofield, District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1106
New York, New York 10007

Re: Request to Adjourn Conference
Huang et. al. v. Shanghai City Corp. et.al., 19-cv-07702

November 25, 2019

The December 3, 2019, 10:30 a.m. initial conference is adjourned until December 17, 2019, at 10:30 a.m. The parties shall file their joint conference materials at least 7 days in advance. The joint letter, as the Order at Dkt. No. 42 provides, must address the status of the four non-appearing Defendants and one Defendant for whom a summons was not issued.

Dated: November 26, 2019
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Honorable Judge Schofield:

I represent Defendants and I write to request an adjournment of the initial pretrial conference from December 3 to December 17, 18 or 19, 2019. This office was first retained by Defendants in this action on November 13, 2019. Our office appeared and filed an answer on November 18, 2019. On November 19 I emailed Mr. Troy to arrange a conference to discuss the upcoming conference then scheduled for November 26 – and requested that Mr. Troy forward a proposed discovery schedule. At that time, it was my intention and hope to be ready to proceed with the initial pretrial conference on November 26. However, I did not hear back from Mr. Troy's office.

On November 22, I received the Court's Order (Doc 42) adjourning the initial pretrial conference from November 26 to December 3, 2019. I will be in Israel and the West Bank from November 28 to December 13, 2019. I am traveling with an organization known as Encounter in the West Bank December 2 – 5 and then visiting children and grandchildren in Israel until December 12 when I return to New York. My Synagogue in conjunction with Encounter have been planning the Encounter trip for over six months – long before Plaintiffs commenced this action. I was required to apply for approval, read various background material and attend several meetings in addition to advancing the cost of the trip. The purpose of the Encounter trip to the West Bank is to listen, learn and report back to our community concerning the complicated issues.

On November 22 I emailed Mr. Troy and requested his consent to adjourn the December 3 conference to Dec. 17, 18 or 19, 2019 because I will not be available to attend the conference

on December 3 due to pre-existing travel plans from November 28 to December 13. As of this time, Mr. Troy has not responded to my request for an adjournment. I have not previously requested an adjournment in this matter. A proposed discovery schedule is due tomorrow and no discovery dates have been set at this time.

I have been the lead defense counsel participating in all aspects of the related litigation in the Eastern District and Southern District and most appropriate attorney to attend the conference with the court. Therefore, I respectfully request the court to adjourn the initial pretrial conference from December 3 to December 17, 18 or 19, 2019 so that I can participate in the conference.

Sincerely,
Fong & Wong, PC

/s/ David B. Horowitz

By: David B. Horowitz, Esq. (1890)
Attorneys for Defendants